

# BLANKROME

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September 3, 2020

**VIA CM/ECF**

The Honorable Vernon S. Broderick  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 9/8/2020

**Re: *Great Western Insurance Co. v. Mark Graham, et al.*, No. 18-cv-06249**

Dear Judge Broderick:

This firm represents Defendants Wilmington Savings Fund Society, FSB and Christiana Trust (“WSFS”) in the above-referenced matter. We submit this letter jointly with Plaintiff Great Western Insurance Co. (“Great Western”).

The Court’s July 23, 2020 Order setting the schedule for jurisdictional discovery (ECF 192) requires Great Western and WSFS to submit any letter motions regarding any discovery disputes by September 4, 2020.

On August 25, 2020, Great Western and WSFS met and conferred regarding the jurisdictional discovery. Since that time, the parties have been working diligently and in good faith to resolve their disputes without the Court’s intervention.

Given this progress, Great Western and WSFS respectfully request that this Court extend the deadline for the parties to file any letter motions regarding jurisdictional discovery (if necessary) from September 4, 2020 to September 18, 2020, and opposition letter motions from September 11, 2020 to September 25, 2020. Both parties are hopeful that they can resolve many of their current disputes within the next two weeks without the Court’s intervention.

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We thank the Court for its courtesy and consideration.

Respectfully submitted,

*/s/ Huaou Yan*

Huaou Yan

cc: All counsel of record (via CM/ECF)